UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
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Claudio Rene, *individually and on behalf of others*   Case No.: 21-cv-07435
similarly situated,

Hon. John G. Koeltl, U.S.D.J.

                                Plaintiff,   **NOTICE OF MOTION**

           -against-

31 East 21 Express Inc., Best Thai on 8 Corp., RTC 18
Corp., 331 Lexington Restaurant Corp. (all doing
business as Rhong-Tiam Express), Express Thai One,
Inc., Lucky Thai Express Inc., Pun San Laan Inc, Best
Thai on Gramercy Inc., Karnchanart Sae Loo, Andy
Yangeksakul a/k/a Andy Yang, Macharvadee
Premwongsiri and Thanaphan Laonutwuttikul

                            Defendants.
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      PLEASE TAKE NOTICE that upon the annexed Memorandum of Law dated January 20,

2023, together with the supporting declaration of Jason Mizrahi (the "Mizrahi Decl.") and the

exhibits annexed thereto, Defendants Pun San Laan Inc. (the "Corporate Defendant") and

Thanaphan Laonutwuttikul (the "Individual Defendant", and together with the Corporate

Defendant, the "Nana Thai Defendants", or "Nana Thai"), by and through their attorney Levin-

Epstein & Associates, P.C. will move this Court, the Honorable District Judge John G. Koeltl

presiding, for an order granting the Nana Thai Defendants' motion to dismiss the Amended

Complaint, filed on July 25, 2022 [Dckt. No. 49] (the "Amended Complaint" or the "Am. Compl.")

by Plaintiff Claudio Rene Calle (the "Plaintiff"), pursuant to Federal Rule of Civil Procedure

("Fed.R.Civ.P.") 12(b)(6), and for such other and further relief as the Court deems just and proper.

      PLEASE TAKE FURTHER NOTICE that answering papers, if any, must be served on or

before February 3, 2023, and Defendants' reply must be served on or before February 10, 2023.

Dated: New York, New York
       January 20, 2023

                           Respectfully Submitted,

                           LEVIN EPSTEIN & ASSOCIATES, P.C.

                           /s Jason Mizrahi
                           Jason Mizrahi, Esq.
                           Joshua Levin-Epstein, Esq.
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                           Attorneys for Defendants Pun San Laan Inc. and Thanaphan Laonutwuttikul

Cc: All parties via ECF